



MEMO ENDORSED

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March 15, 2024

VIA ECF

Hon. Katharine H. Parker
U.S. Magistrate Judge
United States District Court, S.D.N.Y.
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED: The initial scheduling and case management conference scheduled for **Monday, March 25, 2024 at 2:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York, is hereby adjourned to Tuesday, May 7, 2024 at 2:00 p.m.**

The Clerk of Court is directed to mail a copy of this endorsement to the Plaintiff.

APPLICATION GRANTED

Katharine H. Parker

Re: **Caro v. LJB Facilities Management, LLC.; Case No. 1:23-cv-03513 (JHR)**

Hon. Katharine H. Parker, U.S.M.J.

03/17/2024

Dear Judge Parker:

This law firm represents Defendant LJB Facilities Management, LLC ("Defendant") in the above-referenced action. We write to respectfully request an adjournment of (1) the March 18, 2024 submission date for the Proposed Case Management Plan for Pro Se cases ("Case Management Plan"), and (2) the initial scheduling and case management conference, currently scheduled for March 25, 2024, until dates convenient for the Court occurring after April 29, 2024.

Defendant requests this relief so that the case management conference and submission of the Case Management Plan are adjourned until after Defendant's deadline for its responsive pleading to Plaintiff's complaint, which is April 29, 2024. Indeed, Defendant mailed a completed Acknowledgment of Receipt of Service to the U.S. Marshals Office on February 27, 2024. Since Defendant timely returned a waiver of service, Defendant was granted sixty (60) days from the date the Defendant mailed the waiver of service to the U.S. Marshals Office. Fed. R. Civ. Pro. 4(d)(3). The additional time will allow Defendant to investigate the allegations in the Complaint, draft and file a responsive pleading and adequately prepare for the conference.

We contacted the Pro Se Plaintiff, Randy Caro, at the telephone number on the docket to request his consent to this request. The person who answered said he was not available, so we left a message.

This is the Defendant's first request for the relief sought herein. We thank Your Honor for your consideration of this request.

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Respectfully Submitted,

LITTLER MENDELSON, P.C.
/s/ Lisa M. Griffith

Lisa M. Griffith

cc: Randy Caro
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